EXHIBIT 13

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
(Northern Division)

BLANCA P. CEDILLOS-GUEVARA	:	
	:	
v.	:	
	:	CASE NO. 1:14-cv-00196-GLR
	:	
MAYFLOWER TEXTILE	:	
SERVICES CO., et al.	:	

DEFENDANT MUKUL M. MEHTA'S ANSWERS TO PLAINTIFFS' FIRST SET OF INTERROGATORIES

Defendant Mukul M. Mehta ("Mehta"), by and through its undersigned counsel, hereby sets forth the following answers and objections to Plaintiffs' First Set of Interrogatories and states as follows:

PRELIMINARY STATEMENT

Mehta has not completed its investigation in connection with respect to this lawsuit, has not completed discovery, has not commenced its preparation for trial, and has not contacted the putative members of the proposed class or otherwise obtained discovery from these individuals. As such, any objections and/or responses to these Interrogatories are given without prejudice to Mehta's rights to produce evidence of any subsequently discovered fact or facts, and to assert factual and legal contentions as additional facts are ascertained, analyses are made, and legal research is completed.

Mehta has made/is in the process of making reasonable efforts to address the matters called for by each Interrogatory, subject to objection, as Mehta understands and interprets each Interrogatory. If Plaintiffs subsequently assert an interpretation of any Interrogatory that differs

3. Identify all persons who are likely to have personal knowledge of any fact alleged in the complaint or in your answer to the complaint, and state the subject matter of the personal knowledge possessed by each such person. (Standard Interrogatory No. 6).

Answer: Mukul Mehta; President of Mayflower; has general knowledge of Mayflower and its operations. Niamat Kalra; Vice President of Operations of Mayflower; has knowledge of Mayflower's day to day operations including, but not limited to, hours worked, wages paid, general operations, and relationships with third parties (including Co-Defendants). Manisha Ravikumar; Office Manager of Mayflower; has knowledge pertaining to all administrative aspects of Mayflower's operations including, but not limited to, recording of hours, coordination with a third party payroll provider, and dissemination of hours worked to third parties. Vivek Deshmukh; Plant Manager for Mayflower; has knowledge related to daily operations and the laborers at the Mayflower Laundry Facility. William Harvey; Soil Room Supervisor for Mayflower; has knowledge related to daily operations and the laborers at the Mayflower Laundry Facility. Kanu Moseray; Plant Manager for Advantech; has knowledge related to daily operations and the laborers at the Mayflower Laundry Facility. Named Plaintiffs, Opt-In Plaintiffs, and putative members of the proposed class have knowledge of their hours worked and the applicable wage and hour practices. The individual Co-Defendants, as well as employees at the entity Co-Defendants, have knowledge as to the wage and hour practices utilized at each respective third party for its employees, as well as the hours worked that were provided to them by Mayflower. Valentin Abgaryan received hours worked records for individuals employed by Argo Management Group, Inc. and related entities. Esther Williams received hours worked records for individuals employed by East to West Enterprises, Inc. and related entities. Andrey Gustave received hours worked records for individuals employed by individual supervised the Covered Employee(s); and (d) the Covered Employee(s) whom he or she supervised.

Answer: Objection. On the advice of counsel, Mehta objects to this Interrogatory because it is not reasonably calculated to lead to the discovery of admissible evidence to the extent it seeks documents relating to individuals that are not parties to this lawsuit (see, General Objection No. 10). Mehta further objects to this Interrogatory as overbroad and unduly burdensome given the extent and detail sought by the various subparts. Without waiving this objection, see Answer to Interrogatory No. 3, with particular respect to Kanu Moseray, Vivek Deshmukh, and William Harvey.

8. Identify and describe every timekeeping system or program, utilized by you or any of the other defendants during the Covered Period, that tracked or recorded the time worked by the Covered Employees, and for each system, state: (a) the dates the timekeeping system was used at the Mayflower Laundry Facility; (b) if the timekeeping system is not presently being used at the Mayflower Laundry Facility, the reason(s) why it is no longer being used; (c) how the timekeeping system recorded the time worked by the Covered Employees; (d) whether each of the Covered Employees used the same timekeeping system; (e) where each timekeeping system was located; (f) the person(s) responsible for supervision and maintenance of each timekeeping system; and (g) where the records from the timekeeping system are currently located. This Interrogatory includes timekeeping systems even if they were not the primary method used by you for tracking the time worked by the Covered Employees. If you do not maintain accurate time records of all hours worked by the Covered Employees, identify and describe all reasons that you have failed to maintain accurate time records of actual hours worked.

Answer: Objection. On the advice of counsel, Mehta objects to this Interrogatory because it is not reasonably calculated to lead to the discovery of admissible evidence to the extent it seeks documents relating to individuals that are not parties to this lawsuit (see, General Objection No. 10). Mehta further objects to this Interrogatory as overbroad and unduly burdensome given the extent and detail sought by the various subparts. Without waiving this objection, for the entirety of the Covered Period, all laborers that have worked at the Mayflower Laundry Facility, have used an electronic timeclock that registers an individual's fingerprint. A user punches in and punches out by swiping his or her finger across the timeclock. The timeclock is located outside of the manager's office, which is near the entrance to the Mayflower Laundry Facility. In addition, many individuals that worked at the Mayflower Laundry Facility completed handwritten timesheets during their first few weeks working at the Mayflower Laundry Facility. The electronic timeclock was supervised by Manisha Ravikumar. The electronic records from the electronic timeclock are maintained within the software associated with the electronic timeclock on Mayflower's computer system. Mayflower also maintains in its records week by week timeclock reports.

9. Identify all individuals who worked at the Mayflower Laundry Facility at any time from January 1, 2011 to the present. For each such individual, describe: (a) his or her job title(s) or position(s); (b) the time period(s) he/she held each of the title(s) or position(s); (c) each of his/her rate(s) of pay, and, if there was more than one rate of pay, identify the time period(s) and position(s) for each such rate; (d) the total hours he/she worked in each calendar week from January 1, 2011 to the present; (e) the total pay he/she received for each calendar week from January 1, 2011 to the present; (f) the total hours he/she worked in each pay period from January 1, 2011 to the present; (g) the total pay he/she received for each pay period from January 1, 2011

Defendant, including but not limited to non-payment of overtime bonus pay for work in excess of 40 hours per week, brought against you, specifying name of case, date, court, case number, outcome, persons involved, whether an investigation was performed, either internally or by any government agency, and the result of any such investigation, from January 1, 2000 to the present.

Answer: Objection. On the advice of counsel, Mehta objects to this Interrogatory to the extent it is overly broad and unduly burdensome because it seeks materials that predate the "Covered Period", as defined by Plaintiffs, of January 1, 2011 to the present. Moreover, counsel for Plaintiffs has extensive records already in its possession relating to litigation that occurred prior to January 1, 2011. Without waiving this objection, no such documents exist relating to the Covered Period.

18. Describe the position(s) held by you with any of the Corporate Defendants and specifically state your duties with respect to the operation of the Mayflower Laundry Facility, and provide any job description(s) for your position(s); describe all activities you performed in furtherance of the operations of the Mayflower Laundry Facility; your regular work schedule at the Mayflower Laundry Facility; and any contractual agreement — oral or written — between you and any of the Corporate Defendants.

Answer: Objection. On the advice of counsel, Mehta objects to this Interrogatory to the extent it is overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence inasmuch as there is no time limitation contained in this Interrogatory. Without waiving this objection, Mehta is the President of Mayflower. Mehta is not involved in the day to day operations of Mayflower and is not involved in day to day operational decisions relating to Mayflower, including the hours worked by its employees or the wages paid to its employees. Mehta is involved as needed and is consulted with respect to significant issues, such as sizeable unplanned expenses and unexpected problems.

19. Describe the legal and financial relationship between you and each of the Defendants; and, for the Covered Period, provide a listing of all compensation received by you from any of the Defendants.

Answer: Objection. On the advice of counsel, Mehta objects to this Interrogatory to the extent it is unduly burdensome and intended to harass because it seeks information relating to the compensation received by Mehta. In addition, this Interrogatory is also objectionable because Mehta's compensation does not tend to prove or disprove any claims or defenses at issue in this lawsuit. Furthermore, this Interrogatory is vague and ambiguous to the extent it does not define what it means by a financial relationship. Without waiving this objection, Mehta only has a relationship with Mayflower. In this respect, see Answer to Interrogatory No. 18.

20. Describe all communications you have had with Defendant Valentin Abgaryan during the Covered Period, including any business relationships you have had with him or with any business entity he owns or controls.

Answer: Objection. On the advice of counsel, Mehta objects to this Interrogatory to the extent it is overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence inasmuch as the Interrogatory is not limited to any specific subject matter, let alone any matter that may lead to admissible evidence that tends to prove or disprove any of the claims or defenses in this lawsuit. Without waiving this objection, aside from possibly greeting Mr. Abgaryan at some point during the Covered Period, Mehta has not had any conversations with Mr. Abgaryan and has not communicated with Mr. Abgaryan regarding any business relationships.